

Exhibit D

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001	03-MD-1570 (GBD)(SN) ECF Case
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This document relates to: *All Cases*

DECLARATION OF OMAR T. MOHAMMEDI, ESQ.

I, Omar T. Mohammedi, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury:

1. I am the managing partner at the Law Firm of Omar T. Mohammedi, LLC, “OTMLAW”, counsel for defendants World Assembly of Muslim Youth and World Assembly of Muslim Youth International (collectively, “WAMY”) in the referenced action
2. Steven Siegler, Esq., a former attorney with my firm, attended the deposition of Musaed Al Jarrah on June 17, 2021 on behalf of WAMY.
3. Mr. Siegler provided written assurances that he did not receive a copy of the Al Jarrah deposition transcript and did not share the Al Jarrah deposition transcript with Michael Isikoff, anyone acting on his behalf, or anyone not authorized to receive the deposition under the terms of the Protective Orders.

4. Mr. Siegler further confirmed that he did not communicate with Isikoff or anyone acting on his behalf regarding the contents of the Al Jarrah deposition from June 1, 2021 to August 1, 2021.

5. On June 18, 2021, no one at OTMLAW attended the deposition of Al Jarrah.

6. OTMLAW did not order or receive copies of the Al Jarrah deposition transcripts.

7. Accordingly, no one associated with OTMLAW downloaded, saved, stored, or otherwise maintained any transcript of the Al Jarrah depositions.

8. As OTMLAW never had possession of a copy of any Al Jarrah deposition transcripts, no one at OTMLAW shared any Al Jarrah deposition transcripts with Michael Isikoff, anyone acting on his behalf, or anyone not authorized to receive the deposition under the terms of the Protective Orders.

9. No one at OTMLAW communicated with Michael Isikoff or anyone acting on his behalf regarding the contents of the Al Jarrah deposition from June 1, 2021 to August 1, 2021.

10. Upon receipt of the Court's August 30, 2021 Order, I assessed that my firm had no role in the breach of the Protective Orders:

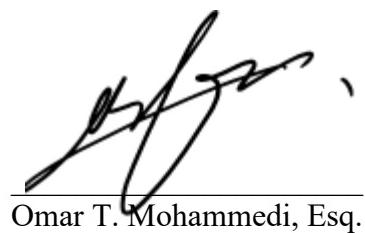
a. Jill Mandell, Esq., another attorney with my firm, did not attend the Al Jarrah deposition and has never seen a transcript from his deposition. She has never spoken to Michael Isikoff or anyone acting on his behalf.

b. Fredrick Goetz, Esq. my co-counsel in this case did not attend the Al Jarrah deposition and has never seen a transcript from his deposition. He has never spoken to Michael Isikoff or anyone acting on his behalf.

c. My office manager, Diandra Baird, who is responsible for ordering and saving the transcripts for OTMLAW cases, did not receive a transcript of the Al Jarrah deposition and did not speak to Michael Isikoff or anyone acting on his behalf.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, NY
September 27, 2021



A handwritten signature in black ink, appearing to read "Omar T. Mohammedi, Esq.", is written over a horizontal line. The signature is fluid and cursive, with a distinct flourish at the end.